

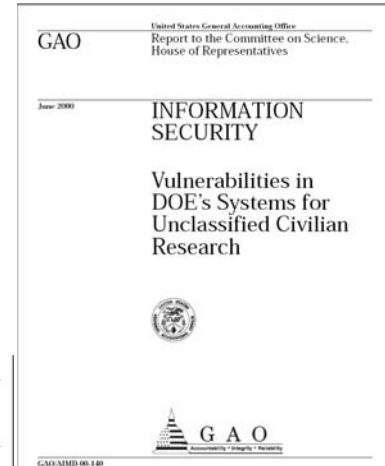
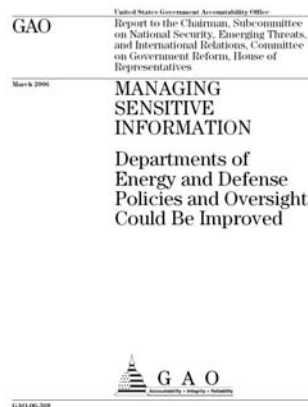
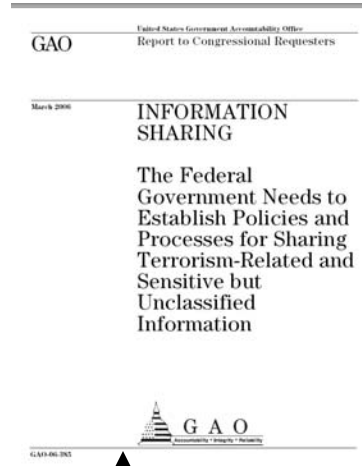
# Unclassified Information Protection at Sandia Labs

## Presented to IMC

Michael D. Gomez  
Office of the Chief Information Officer  
Sandia National Laboratories

New Orleans, LA  
March 5, 2009

# How We Got Here - Why Simplify?



1. SNL Classification Dept. Identified numerous reports indicating the unclassified systems are complex and poorly implemented
2. We are now, and will continue to be asked to protect "sensitive" information with much more rigor than ever before

# Objectives We Sought to Achieve

## **Redevelopment of Sandia Unclassified Information Protection Policies**

- Reduce (greatly) volume of material in the CPR
  - Remove the many “optional” and “suggested” choices
  - Reduce from previous draft of 19+ pages
- Investigate Opportunities to Further Simplify the Structure of the policy content
- Pursuing the Creation of a “Diagnostic”
  - Guide users to the information they need
    - additional information about identification, marking, protection, dissemination, and disposition of each type as required
  - Potential use of:
    - Linkable Graphics
    - Flow Diagram(s)
    - A Design Similar to a Wizard (i.e. TurboTax)

# What We Were Really Trying To Achieve

Definitely not this...



Or even this...



But more like this...



The Subject Matter Experts, the human factors engineers and users tested all seem to feel we've achieved this objective.  
Now we need to socialize the tools better.

# The Previous Version Did Not Satisfy

Pending UCI Policies & Guidelines

Is the increased degree of complexity  
a good direction for Sandia?

For CAST Discussion  
October 10, 2006

The goal was to get  
us from a total page  
count approaching  
100 to around 30

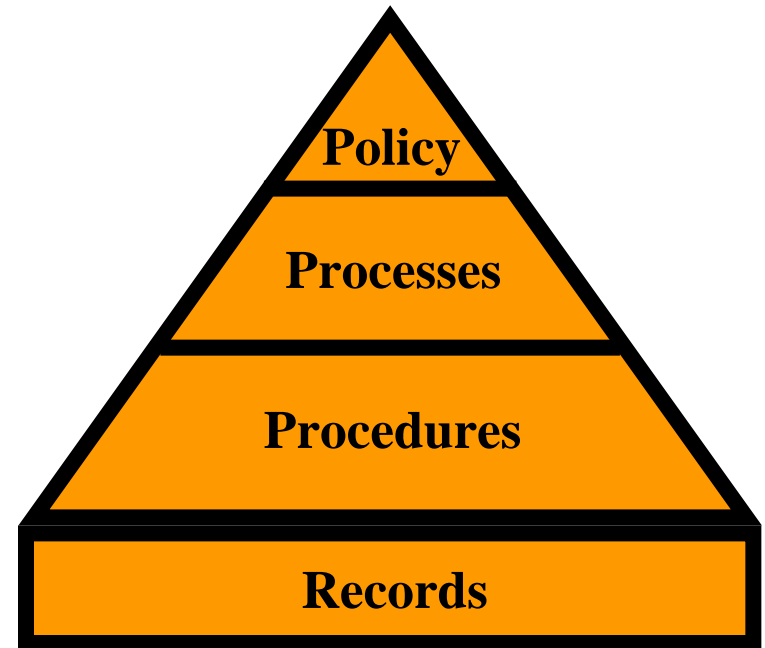
	Previous Version	New Revision	Comments
<b>CPR400.2.20</b>			
Section 4	19	4	←
<b>Attachments</b>			
"Company Sensitive"	5	0	Guidance absorbed into CPR document
"UPI"	8	5	Now designated as "Sandia Proprietary"
AT	4	3	
CRADA	5	1	
ECI	8	2	
OUO	18	3	
PA	3	2	
PC	3	2	
PROP	3	2	Now designated as "Third Party Proprietary"
SBIR/SBBR	2	2	
SGI	4	3	
UCNI	8	3	
U-NNPI	3	2	
Attorney-Client/Attorney Work Product	0	1	
<b>Attachment Subtotal</b>	<b>74</b>	<b>30</b>	
<b>Grand Total</b>	<b>93</b>	<b>34</b>	
Process for Identifying Information		13	Diagnostic
UCI Flowchart		1	Diagnostic
Information Branching Tree		1	Diagnostic

Sandia Members of the Workforce can now  
refer to just 1 page  
(in various formats)

to get "the whole picture"

# ISO9000-Driven Documentation Philosophy

- ✓ Policy  
CPR400.2.20
- ✓ Processes  
“Identifying Information Types” Process  
Branching Tree Diagram  
UCI Flowchart
- ✓ Procedures  
“Minimum Standards for Control of ...”
- ✓ Guidelines & Suggestions  
SME WebPages



Follows direction set by the  
Corporate Contracts & Policy Mgmt Organization

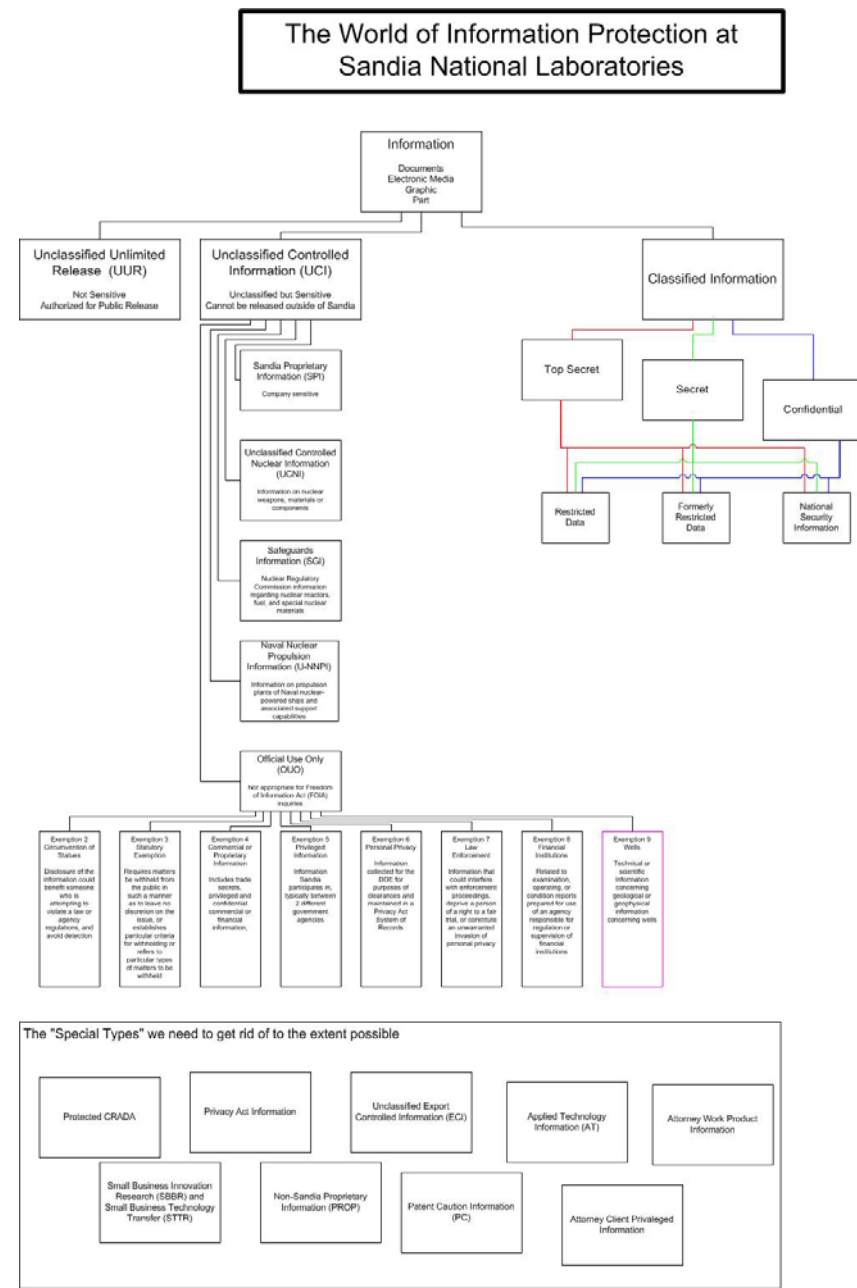
# The Basis of the Improvement

Oddly enough, this graphic had never been attempted before by the Subject Matter Experts (SMEs)

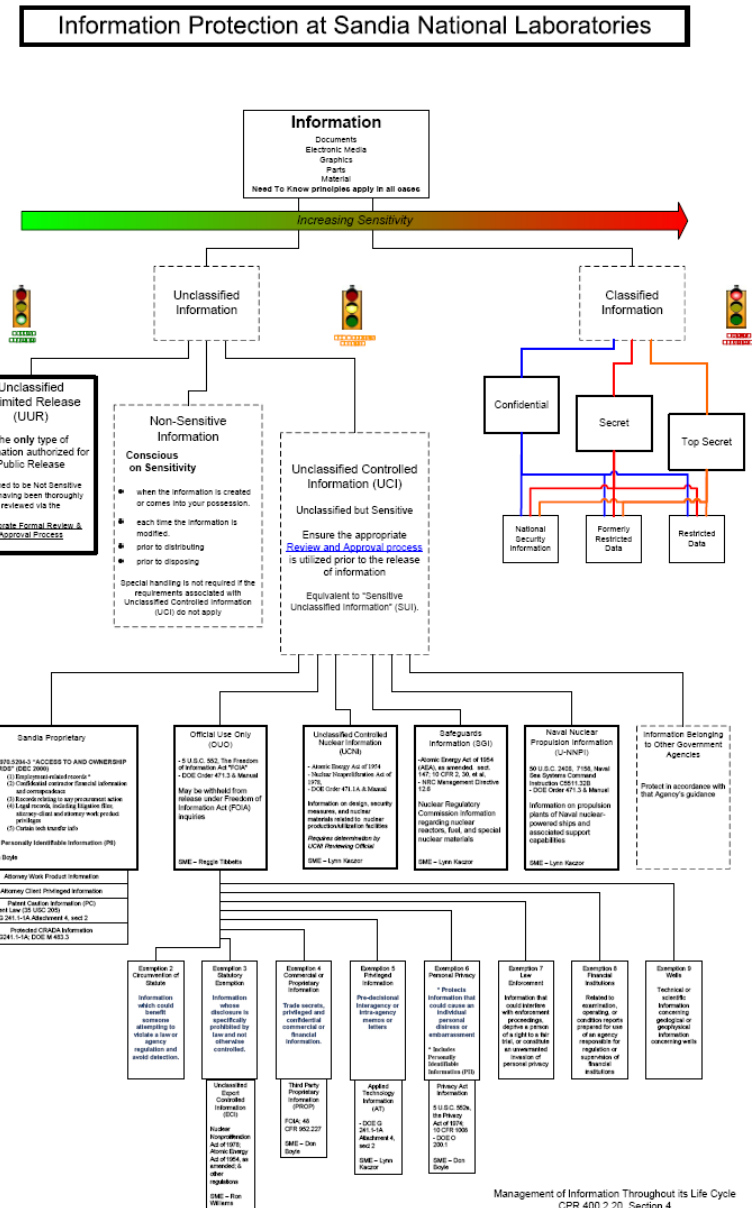
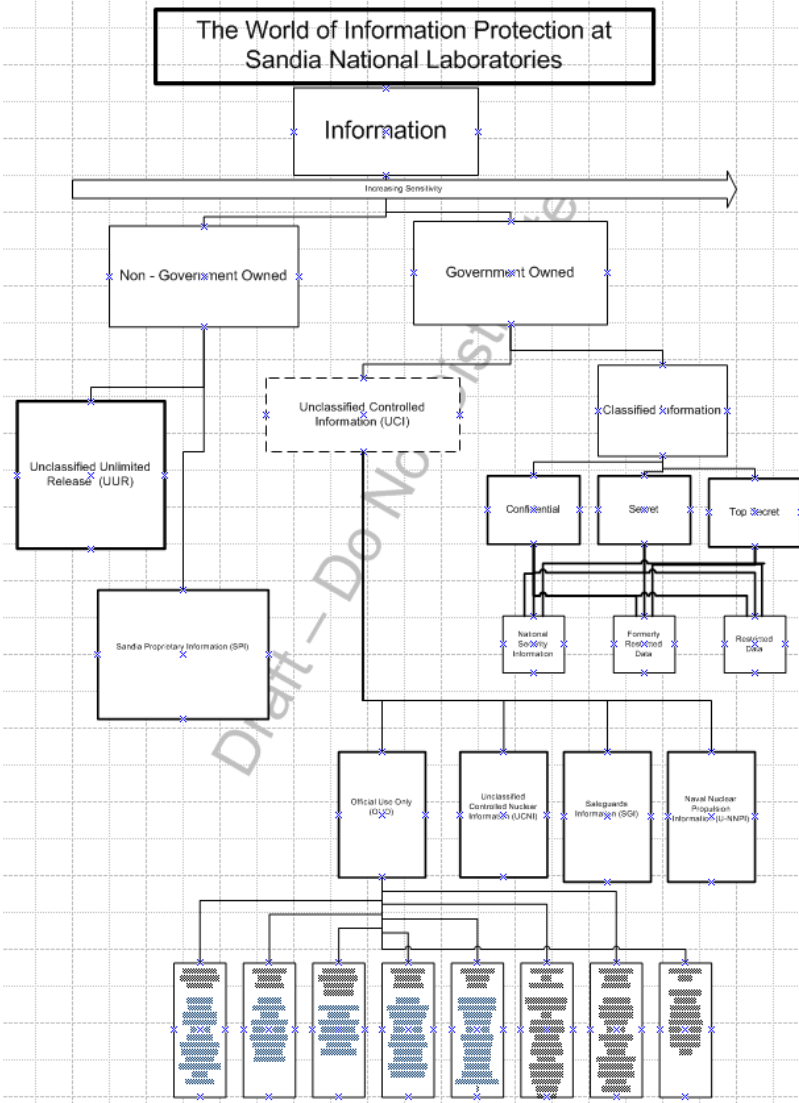
After I drew this original version, it became the basis for all future discussions about information categories among the SMEs

This graphic has undergone **well over thirty revisions** to date

This diagram has become the basis for discussions surrounding Sensitive Info/UCI/SUI/... at Sandia Labs (as opposed to no platform from which to discuss before.



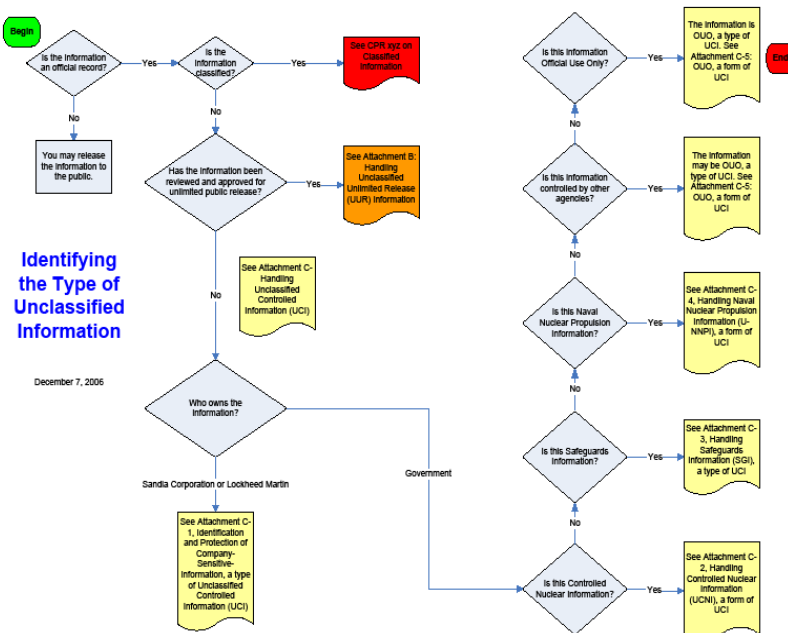
# Original vs. Current





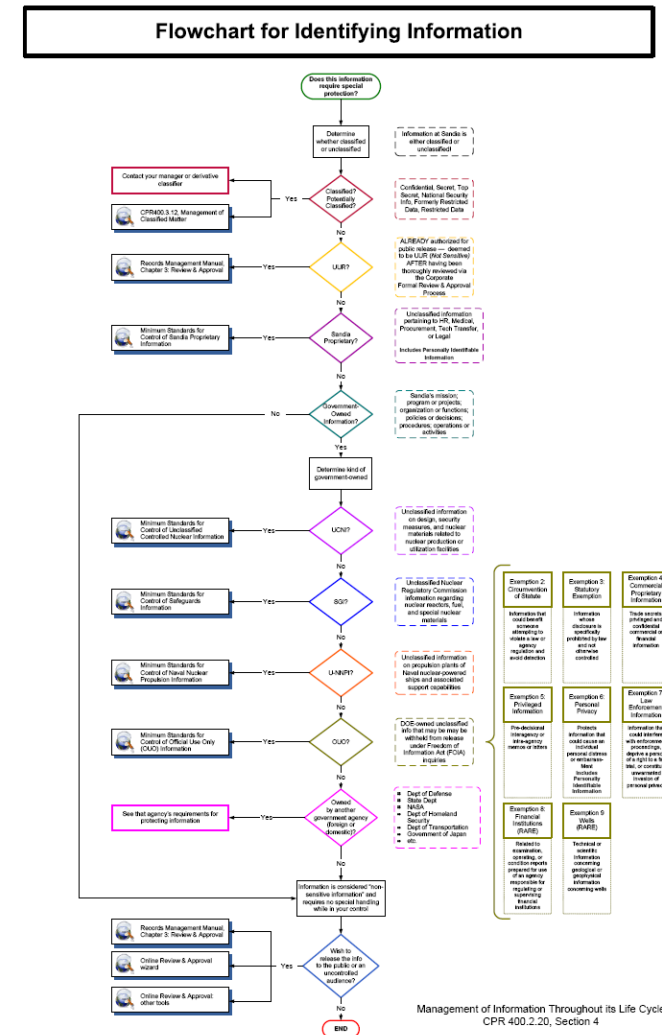
# A Flowchart Was Developed

## To Help Staff Identify What Type Of Information They Had Or Sought



## Identifying the Type of Unclassified Information

December 7, 2006



Management of Information Throughout its Life Cycle  
CPR 400.2.20, Section 4

# Other Diagnostics And A Set Of “Minimum Requirements” Procedures Were Developed.

## Process for Identifying Information

### Contents

Overview .....	2
1. Is the Information Classified or Unclassified? .....	2
2. Is this Unclassified Unlimited Release (UUR) Information? .....	3
3. Unclassified Controlled Information .....	4
4. Is this Sandia Proprietary Information? .....	4
5. Is this Government-Owned Information? .....	5
6. Is this Unclassified Controlled Nuclear Information (UCNI)? .....	5
7. Is this Safeguards Information (SGI)? .....	6
8. Is this Unclassified Naval Nuclear Propulsion Information (U-NNPI)? .....	6
9. Is this Official Use Only (OUO)? .....	7
Descriptions of OUO Exemptions .....	7
9.1 Circumvention of Statute (Current Document) .....	7
9.2 Statutory Exemption (Exer <sup>CTRL</sup> + click to follow link) .....	8
9.3 Commercial or Proprietary Information (Exemption 4) .....	8
9.4 Privileged Information (Exemption 5) .....	9
9.5 Personal Privacy (Exemption 6) .....	11
9.6 Law Enforcement (Exemption 7) .....	11
9.7 Financial Institutions (Exemption 8) .....	12
9.8 Wells (Exemption 9) .....	12
10. Is this Information Controlled by Other Agencies? .....	12
11. If the Information Does Not Meet Any of the Above Criteria .....	12
12. List of Other Attachments for Section 4 .....	13
13. References .....	13

Minimum Standards for Control of Sandia Proprietary Information	
Subject Matter Expert	Donald Boyle
Organization	11100
Phone	(505) 844-8900
Email	dboyle
Contents:	
1. Identification	
2. Marking	
3. Protection and Dissemination	
4. Authorities	
1. Identification	
Sandia Proprietary Information. The following records are considered the property of the Sandia Corporation and are not Government records subject to the Freedom of Information Act.	
(1) Employment-related records (including information protected as "Personally Identifiable Information") such as workers' compensation files, employee relations records, records on salary and employee benefits, drug testing records, labor negotiation records, records on ethics, employee concerns, and other employee related investigations conducted under an expectation of confidentiality, employee assistance program records, and personnel and medical health-related records (and similar files), and non-employee patent medical/health-related records, except for those records described by the Prime Contract as being maintained in a Privacy Act systems of records; and	
(2) Confidential Sandia financial information, and correspondence between Sandia and other segments of Lockheed Martin located away from the DICE facility; and	
(3) Records relating to any procurement action by Sandia, except for records that under 48 CFR 970.5232-3, Accounts, Records, and Inspection, are described as the property of the Government; and	
(4) Legal records, including legal opinions, litigation files, and documents covered by the attorney-client and attorney work product privileges; and	
(5) The following categories of records maintained pursuant to the technology transfer clause of this contract:	
(i) Executed license agreements, including exhibits or appendices containing information on royalties, royalty rates, other financial information, or commercialization plans, and all related documents, notes, and correspondence	
(ii) The contractor's protected Cooperative Research and Development Agreement (CRADA) information and appendices to a CRADA that contain licensing terms and conditions, or royalty or royalty rate information	
(iii) Patent, copyright, mask work, and trademark application files and related contractor invention disclosures, documents and correspondence, where the contractor has elected rights or has permission to assert rights and has not relinquished such rights or turned such rights over to the Government.	
2. Marking	
Mark these records as Sandia Proprietary information and with any additional appropriate marking to convey the distribution limitation and any additional advice on the handling or access of the information, for example "Human Resource Use Only."	
Special Marking and Protection Requirements:	
Certain types of Sandia Proprietary information, such as information related to legal matters, technology transfer, or other proprietary information, may require special marking or protections. Sandia Proprietary subcategories and their requirements are identified and listed below:	
• Attorney-Client Privileged/Attorney Work Product	
• Patent Caution Information	
• Protected CRADA Information	
• Sandia Proprietary information that is distributed externally should be marked "Sandia Proprietary information" or in accordance with the direction below for LM Proprietary information or as directed by Sandia Legal for legal records.	
• Sandia Proprietary information that may have been erroneously marked "OUO" should be re-marked as "Sandia Proprietary" prior to being used or distributed.	

Management of Information Throughout its Life Cycle (2014-01-23)  
Version 4.3.1 (Information Classification & UUR - Sandia Proprietary Information)

p. 1

Management of Information Throughout its Life Cycle (2014-01-23)  
Version 4.3.1 (Information Classification & UUR - Sandia Proprietary Information)

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## Minimum Standards for Control of Unclassified Controlled Nuclear Information

Subject Matter Expert Lynn Marie Kaczor

Organization 04225  
Phone (505) 845-8080  
Email lmka@ro

Contents:

1. Identification
2. Marking
3. Protection and Dissemination
4. Disposition
5. Authorities
6. Penalties

For guidance, interpretations and more details, see:  
<http://www.orn.sandia.gov/security/depc/classification/ucni/menu.htm>

1. **Identification:** Unclassified Controlled Nuclear Information (UCNI) is information whose unauthorized dissemination is prohibited under the Atomic Energy Act. UCNI may contain details about the design of nuclear production or utilization facilities; security measures for protecting such facilities; nuclear materials contained in such facilities; or nuclear materials in transit.

- UCNI may only be identified and authorized for marking by an officially designated UCNI Reviewing Official (UCNI RO).

2. **Markings for UCNI** include page markings and front markings:

**Front markings** include a front legend containing the following information: the name and organization of the Reviewing Official, the date the UCNI decision was made, and a list of all UCNI guidance used. Page markings are also required.

UNCLASSIFIED CONTROLLED NUCLEAR INFORMATION

NOT FOR PUBLIC DISSEMINATION

Unauthorized dissemination subject to civil and criminal sanctions under section 148 of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2168)

## Minimum Standards for Control of Third Party Proprietary Information

Subject Matter Expert Kerry Kampschmidt

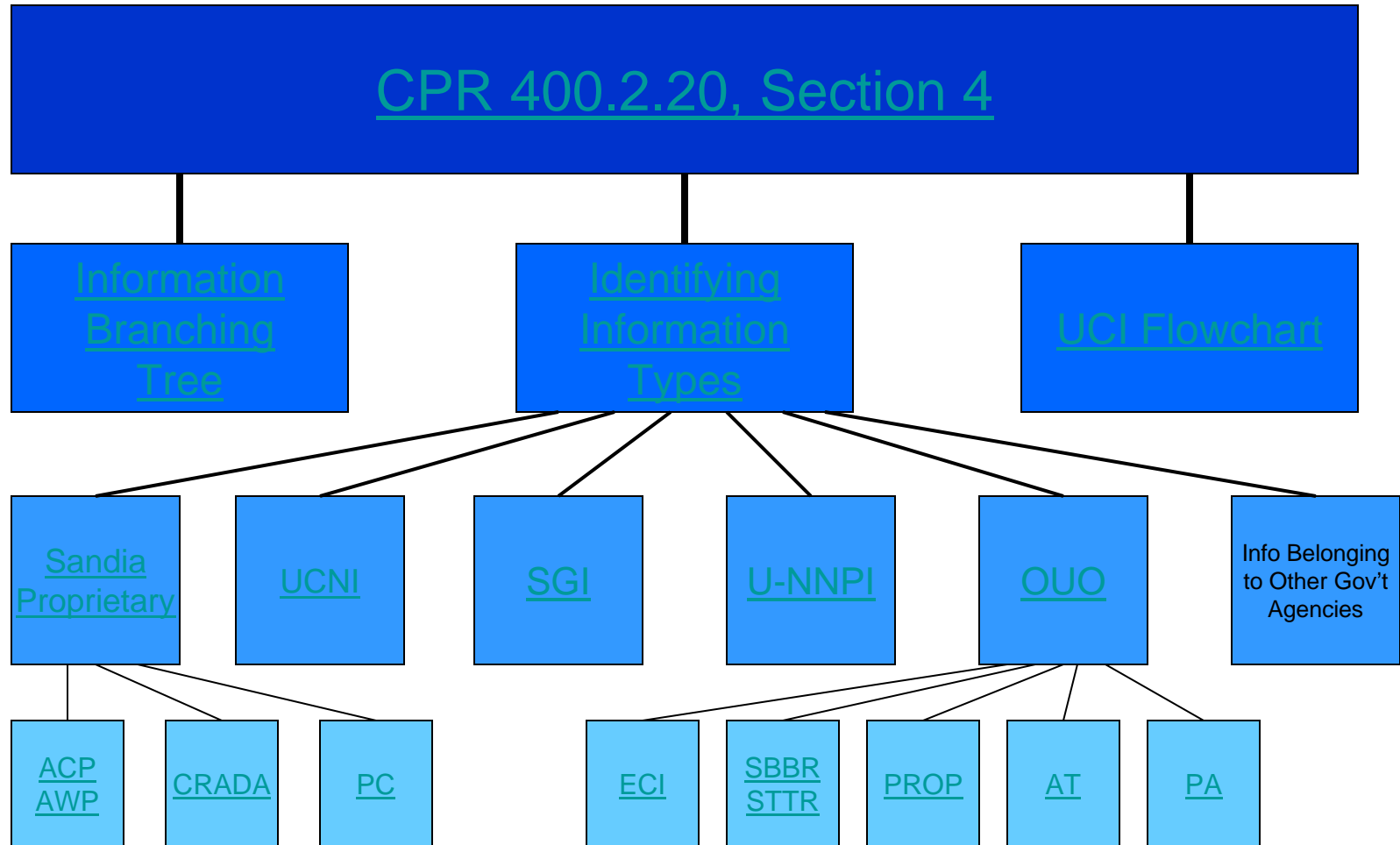
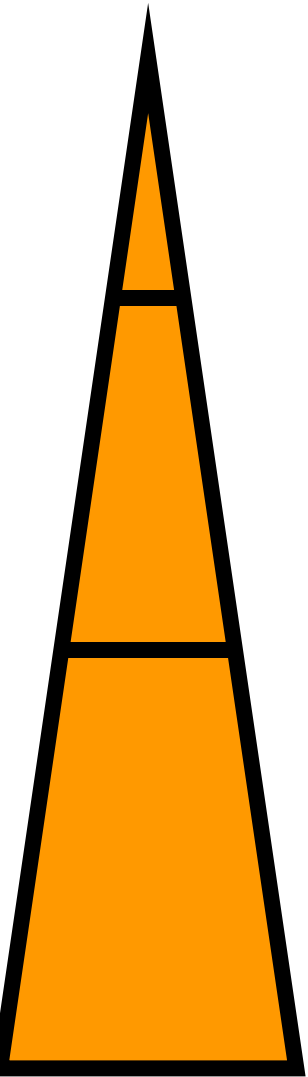
Organization 11700  
Phone (505) 284-9280  
Email kkamps

Contents:

1. Identification
2. Marking
3. Protection and Dissemination

Third Party Proprietary Information is information disclosed to Sandia having restrictions on its use or distribution. Documentation containing such information may have markings or legends indicating such use and/or distribution restrictions, verbal or contractual restrictions can also be placed upon information disclosed to Sandia. Such Third Party Proprietary Information may require additional markings and protection by Sandia to alert those gaining access to the information of these restrictions.

# How the Requirements are Now Organized



# Questions

